



State of Ohio Environmental Protection Agency
Northeast District Office

2110 E. Aurora Road
Twinsburg, Ohio 44087-1969

TELE (330) 425-9171 FAX (330) 487-0769

Bob Taft, Governor
Christopher Jones, Director

December 11, 2001

RE: CLOSURE PLAN
ASF-KEYSTONE
OHD 017 497 587

CERTIFIED MAIL

Bob Ribbing
Griffin Pipe Products
1400 Opus Place
Suite 700
Downer's Grove, IL 60515-5700

Dear Mr. Ribbing:

Thank you for your November 5, 2001 response to Ohio EPA's September 24, 2001 Notice of Deficiency regarding the closure for the Sebring Landfill located in Sebring, OH. I received the response on November 21, 2001.

I have attached comments regarding your response. Please make the necessary changes and re-submit the text of the closure plan. These changes will be considered final.

Please feel free to contact me at (330) 963-1170 if you have an questions.

Sincerely,

Edward J. D'Amato
Environmental Specialist
Division of Hazardous Waste Management

EJD:ddw

Attachment

cc: Pamela Allen, DHWM, Central File, Ohio EPA
Harriet Croke, U.S. EPA, Region V
Ed Lim, Manager, Engineering & Risk Assessment Section, CO, Ohio EPA

ec: John Palmer, DHWM EPA, NEDO
Rich Kurlich, DDAGW, NEDO



Attachment A
Ohio EPA Comments on
Landfill Closure Plan at
ASF - Keystone, Inc., Sebring Landfill

Comment Number	Location of Information	Comment
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General Review Comments

- | | | |
|----|--------------|---|
| 1. | p. 3, ¶3 | Strike the sentence " <i>The material will be disposed following 40 CFR 268 Land Disposal Restrictions,</i> " and replace it with the following text: "The material will be disposed following all applicable regulations." |
| 2. | p. 3, ¶3 | The sentence " <i>If the roll-off hopper is not full, then a cover will be in place to prevent storm water from contacting the material</i> " needs clarification as it could be misinterpreted. The sentence should instead read: "To prevent stormwater from contacting the material, the roll-off hopper will be kept covered at all times, except when adding or removing waste." |
| 3. | p. 4, line 1 | Typo. " <i>Any accumulation on snow...</i> " should read: "Any accumulation <u>of</u> snow..." |
| 4. | | The closure cost estimate should include an estimate for well abandonment. |
| 5. | | Drawing 6D contains a drawing titled: Final Cover. This drawing would have pertained to ASF's previous closure plan involving a cap on the landfill. Since a cap is no longer the method to be used for the landfill closure, please eliminate the Final Cover drawing to avoid confusion. |



State of Ohio Environmental Protection Agency
Northeast District Office

2110 E. Aurora Road
Twinsburg, Ohio 44087-1969

TELE (330) 425-9171 FAX (330) 487-0769

Bob Taft, Governor
Christopher Jones, Director

September 24, 2001

Re: **Notice of Deficiency**
Closure Plan
ASF-Keystone
OHD 017 497 587

Certified Mail

Bob Ribbing
Griffin Pipe Products
1400 Opus Place
Suite 700
Downer's Grove, IL 60515-5700

Dear Mr. Ribbing:

On September 14, 2001, Ohio EPA received from ASF-Keystone a closure for the Sebring Landfill located in Sebring, OH.

Ohio EPA, Division of Hazardous Waste Management (DHWM) has conducted a review of the above referenced closure plan, and has determined it to be incomplete.

We have enclosed, as an attachment to this correspondence, detailed deficiency comments on the closure plan. Please provide a revised closure plan addressing all areas indicated in the deficiency comments. Ohio Administrative Code (OAC) rule(s) 3745-66-12 and/or 3745-66-18 requires that such a revised closure plan be submitted to the director of Ohio EPA for approval within thirty (30) days of the receipt of this letter.

The revised closure plan shall be prepared in accordance with the following editorial protocol or convention:

1. Old Language is over-struck, but not obliterated.
2. New Language is capitalized.
3. Page headers should indicate date of submission.
4. If significant changes are necessary, pages should be re-numbered, table of contents revised, and complete sections provided as required.

The revised closure plan should be submitted to: Ohio Environmental Protection Agency, Division of Hazardous Waste Management, Attn: Pamela Allen, Manager, Information Technologies and Technical Support Section, P.O. Box 1049, Columbus, Ohio 43216-1049. A copy should also be sent to: Ed D'Amato, Ohio EPA, Northeast District Office, 2110 East Aurora Rd, Twinsburg, Ohio 44087.



Bob Ribbing
Griffin Pipe Products
September 24, 2001
Page 2

Ohio EPA will, pursuant to OAC rules 3745-66-12 and 3745-66-18, review the re-submitted plan and issue a final action approving or modifying the plan. Ohio EPA's final action on the re-submitted plan is appealable to the Environmental Review Appeals Commission.

If you wish to arrange a meeting to discuss your responses to this Notice of Deficiency, please contact Ed D'Amato, at (330) 963-1770.

Ohio EPA, DHWM, strongly encourages you to consider pollution prevention options for any processes at your facility that generate waste. While implementation of pollution prevention options is not required by Ohio laws and regulations, the application of waste minimization practices may help reduce the expense of remedial activities. Additionally, implementation of pollution prevention options may prevent the creation of new units and as a result eliminate the requirement to submit a closure plan in the future. For assistance in identifying and implementing pollution prevention options, contact Gregg Orr, Ohio EPA Northeast District Office, at (330) 963-1189.

Sincerely,



Frank Popotnik
Supervisor
Division of Hazardous Waste Management

FP:cl
Enclosure

cc: Pamela Allen, DHWM, Central File, Ohio EPA
Harriet Croke, U.S. EPA, Region V
Ed Lim, Manager, Engineering & Risk Assessment Section, CO, Ohio EPA
Ed D'Amato, DHWM, NEDO

ec: John Palmer, DHWM EPA, NEDO
Rich Kurlich, DDAGW, NEDO

Attachment A
Ohio EPA Comments on
Landfill Closure Plan at
ASF - Keystone, Inc., Sebring Landfill

General Review Comments

Comment Number	Location of Information	Comment
1.		The closure plan lacks detailed information regarding any post-closure operation and maintenance that may be necessary. Since this is a closure by removal, little or no post closure care may be necessary, however this still needs to be explained in the closure plan.
2.		As per OAC Rule 3745-66-16, the closure plan must include a survey plat of the property associated with the site.
3.	Section 5.2	Provide the dimensions of the pad and how it will be designed to minimize overspray, rinseate run-off, or other factors influencing cross-contamination.
4.	Section 5.2	Describe how rinseate will be managed and controlled.
5.	Section 5.2	Considering the size of the landfill, please explain if more than one location for a decontamination pad will be required.
6.	Section 5.2	Explain how rinseate will be collected and disposed and include an estimate of rinseate volume to be generated (if possible).
7.	Section 5.2	Explain in more detail the decontamination process for equipment.
8.	Section 5.6	Include an estimate of the amount of debris associated with the decontamination pad(s) that is expected to be generated .
9.	Section 8	Please include in the closure schedule a summary of activities that the Ohio EPA will be given five days notice before such activities occur.
10.	Section 9	The closure cost estimate must include an estimate of all costs associated with the closure. The Ohio EPA, Division of Hazardous Waste Management, Compliance Assurance Section, Enforcement Unit must be notified of the estimate.



State of Ohio Environmental Protection Agency

Northeast District Office

10 E. Aurora Road
Twinsburg, Ohio 44087-1969

TELE (330) 425-9171 FAX (330) 487-0769

Bob Taft, Governor
Christopher Jones, Director

May 1, 2001

RECEIVED

MAY 9 2001

WASTE MANAGEMENT BRANCH
Waste, Pesticides & Toxics Division
U.S. EPA - REGION 5

RE: ASF-KEYSTONE, INC.
SEBRING LANDFILL
OHD 017-497-587
OHIO ID# 02-50-0366
MAHONING COUNTY

Mr. Robert Ribbing
ASF-Keystone, Inc.
10 South Riverside Plaza, 10th Floor
Chicago, IL 60606

CERTIFIED MAIL

Dear Mr. Ribbing:

Thank you for your March 15, 2001 response to Ohio EPA's January 25, 2001 Notice of Deficiency (NOD).

Ohio EPA, Division of Hazardous Waste Management (DHWM) has reviewed your response.

We have enclosed, as an attachment to this correspondence, detailed comments on this response. Note the comments are numbered as they were in the original NOD. Please provide a revised closure plan addressing all areas indicated in the deficiency comments. Ohio Administrative Code (OAC) rule(s) 3745-66-12 require that such a revised amended closure plan be submitted to the director of Ohio EPA for approval within thirty (30) days of the receipt of this letter.

The revised amended closure plan shall be prepared in accordance with the following editorial protocol or convention:

1. Old Language is over-struck, but not obliterated.
2. New Language is capitalized.
3. Page headers should indicate date of submission.
4. If significant changes are necessary, pages should be re-numbered, table of contents revised, and complete sections provided as required.

The revised amended closure plan should be submitted to: Ohio Environmental Protection Agency, Division of Hazardous Waste Management, Attn: Pam Allen, Manager, Information Technologies and Technical Support Unit, P.O. Box 1049, Columbus, Ohio 43216-1049. A copy should also be sent to: Frank Popotnik, Ohio EPA, Northeast District Office, 2110 East Aurora Road, Twinsburg, Ohio.

ASF-KEYSTONE, INC.
SEBRING LANDFILL
MAY 1, 2001
PAGE - 2 -

RECEIVED
MAY 4 2001
WASTE MANAGEMENT DIVISION
U.S. EPA - REGION V

Ohio EPA will, pursuant to OAC rule(s) 3745-66-12, review the re-submitted plan and issue a final action approving or modifying the plan. Ohio EPA's final action on the re-submitted plan is appealable to the Environmental Review Appeals Commission.

If you wish to arrange a meeting to discuss your responses to this letter, please contact Ed D'Amato at (330) 963-1170.

Sincerely,



Frank Popotnik
Environmental Supervisor
Division of Hazardous Waste Management, NEDO

FP:ddw

Attachment

cc: Pam Allen, DHWM, Central File, Ohio EPA
Harriet Croke, U.S. EPA, Region V
Ed Lim, Manager, Engineering & Risk Assessment Section, CO, Ohio EPA
Frank Popotnik, DHWM, NEDO, Ohio EPA
Ed D'Amato, DHWM, NEDO, Ohio EPA
John Palmer, DHWM, NEDO, Ohio EPA
Rich Kurlich, DDAGW, NEDO, Ohio EPA

ATTACHMENT A

- 18 A global document change needs to be made. Reference to, and compliance with OAC rules 3745-65 and 66 should be changed such that the closure plan is in compliance with OAC rules 3745-54 and 55.

ASF Response:

The following text will be added to Section 3.8: "At the request of OEPA all groundwater monitoring requirements will meet the 3745-54 and 55 instead of 3745-65 and 66. Any reference to 3745-65 and 66 in the plan and in the appendices will correspond to the same requirements in 3745-54 and 55."

OEPA response:

It is insufficient to add only the above text. To avoid confusion, references to 3745-65 and 66 must be replaced throughout the document.

- 21 A Sampling and Analysis Plan (SAP) needs to be developed in detail for the soil sampling performed during reclamation. The plan alludes to one, but does not provide sufficient detail.

ASF Response:

The following text will be added after the first paragraph in Section 3.3: "Prior to completing the reclamation of the material that was deposited recently, a sampling and analysis plan will be developed and submitted to OEPA for approval. Upon approval from OEPA, the plan will be placed in Appendix O"

OEPA response:

In order to clarify, a sampling and analysis plan must be submitted prior to beginning sampling activities.

- 22 Clean standards for clean closure of the bottom of the pit needs to be included. Keep in mind that these standards may be amended if need be, as the project proceeds.

ASF Response:

Clean up standards were discussed in Section 7, page 25 of the closure plan. The landfill will be cleaned up to meet the background standards. At this time we have not taken samples in the surrounding area to determine background levels. The landfill will take about seven years to reclaim. Once we near completion of the landfill reclamation, we will begin taking samples to determine the background levels.

OEPA Response:

Although sampling may begin after closure activities are in progress, ASF must submit for OEPA approval a procedure for determining background levels prior to the beginning of sampling activities.

- 23 Make global changes to document incorporating new name.

ASF Response:

The following text will be added as the first paragraph in Section 1.1: "On January 1, 2001 American Steel Foundries changed its name, due to a merger, to ASF Keystone, INC. any reference to American Steel Foundries or ASF in this plan and appendices refers to ASF-Keystone, Inc.."

OEPA Response:

It is insufficient to add only the above text. To avoid confusion, the name must be changed throughout the document.



State of Ohio Environmental Protection Agency

Northeast District Office

10 E. Aurora Road
Twinsburg, Ohio 44087-1969

TELE (330) 425-9171 FAX (330) 487-0769

Bob Taft, Governor
Christopher Jones, Director

June 18, 2001

RE: ASF-KEYSTONE, INC.
SEBRING LANDFILL
OHD 017-497-587
OHIO ID# 02-50-0366
MAHONING COUNTY

Mr. Robert Ribbing
ASF-Keystone, Inc.
10 South Riverside Plaza, 10th Floor
Chicago, IL 60606

CERTIFIED MAIL

Dear Mr. Ribbing:

Thank you for your May 15, 2001 response to Ohio EPA's May 1, 2001 Notice of Deficiency (NOD).

Ohio EPA, Division of Hazardous Waste Management (DHWM) has reviewed your response.

In addition, to your above submission, we have since discussed when ASF should contact Ohio EPA, DHWM if unknown material is discovered during reclamation of the landfill. On May 22, 2001 you proposed via e-mail that the following language included in the closure plan:

"It is anticipated that the following materials will be uncovered during the reclamation of the landfill: sand, slag, scrap metal, clarifier sludge, shot blast collector dust, cooling bed collector dust, cores, floor sweepings, refractory brick, pattern equipment, construction debris, and wood. If any other material is uncovered at the landfill, OEPA-NEDO, Division of Hazardous Waste Management will be notified. The material, other than that previously identified, will remain in place until a representative of OEPA approved the shipment of the material to a proper disposal facility."

This language is acceptable.

Please incorporate all the changes that have been discussed in the Notices of Deficiency into the closure plan and re-submit it for final review.

The revised amended closure plan should be submitted to: Ohio Environmental Protection Agency, Division of Hazardous Waste Management, Attn: Pam Allen, Manager, Information Technologies and Technical Support Unit, P.O. Box 1049, Columbus, Ohio 43216-1049. A copy should also be sent to: Frank Popotnik, Ohio EPA, Northeast District Office, 2110 East Aurora Road, Twinsburg, Ohio.



ASF-KEYSTONE, INC.
JUNE 18, 2001
PAGE - 2 -

Ohio EPA will, pursuant to OAC rule(s) 3745-66-12, review the re-submitted plan and issue a final action approving or modifying the plan. Ohio EPA's final action on the re-submitted plan is appealable to the Environmental Review Appeals Commission.

If you wish to arrange a meeting to discuss your responses to this letter, please contact Ed D'Amato at (330) 963-1170.

Sincerely,



Edward D'Amato
Environmental Specialist
Division of Hazardous Waste Management, NEDO

ED:ddw

cc: Pam Allen, DHWM, Central File, Ohio EPA
Harriet Croke, U.S. EPA, Region V
Ed Lim, Manager, Engineering & Risk Assessment Section, CO, Ohio EPA
Frank Popotnik, DHWM, NEDO, Ohio EPA
Ed D'Amato, DHWM, NEDO, Ohio EPA

ec: John Palmer, DHWM, NEDO, Ohio EPA
Rich Kurlich, DDAGW, NEDO, Ohio EPA

ATTACHMENT A



State of Ohio Environmental Protection Agency
Northeast District Office

2110 E. Aurora Road
Twinsburg, Ohio 44087-1969

TELE (330) 425-9171 FAX (330) 487-0769

Bob Taft, Governor
Christopher Jones, Director

Certified Mail

January 25, 2001

RECEIVED
JAN 31 2001

Mr. Robert Ribbing
ASF - Keystone, Inc.
10 South Riverside Plaza, 10th Floor
Chicago, IL 60606

MNOHMI PERMIT SECTION - WMB
Waste, Pesticides & Toxics Division
U.S. EPA - REGION 5

**Re: Notice of Deficiency, Amended Closure Plan, ASF - Keystone, Inc. - Sebring Landfill
Mahoning County, OHD 017-497-587, Ohio ID# 02-50-0366**

Dear Mr. Ribbing:

On June 2, 2000, Ohio EPA received from ASF - Keystone, Inc. an amended closure plan for the Sebring Landfill.

Ohio EPA, Division of Hazardous Waste Management (DHWM) has conducted a review of the above referenced closure plan, and has determined it to be incomplete and technically inadequate.

We have enclosed, as an attachment to this correspondence, detailed deficiency comments on the closure plan. Please provide a revised closure plan addressing all areas indicated in the deficiency comments. Ohio Administrative Code (OAC) rule(s) 3745-66-12 require that such a revised amended closure plan be submitted to the director of Ohio EPA for approval within thirty (30) days of the receipt of this letter.

The revised amended closure plan shall be prepared in accordance with the following editorial protocol or convention:

1. Old Language is over-struck, but not obliterated.
2. New Language is capitalized.
3. Page headers should indicate date of submission.
4. If significant changes are necessary, pages should be re-numbered, table of contents revised, and complete sections provided as required.



ASF - KEYSTONE, INC.
JANUARY 25, 2001
PAGE - 2 -

The revised amended closure plan should be submitted to: Ohio Environmental Protection Agency, Division of Hazardous Waste Management, Attn: Tom Crepeau, Manager, Data Management Section, P.O. Box 1049, Columbus, Ohio 43216-1049. A copy should also be sent to: Frank Popotnik, Ohio EPA, Northeast District Office, 2110 East Aurora Road, Twinsburg, Ohio.

Ohio EPA will, pursuant to OAC rule(s) 3745-66-12, review the re-submitted plan and issue a final action approving or modifying the plan. Ohio EPA's final action on the re-submitted plan is appealable to the Environmental Review Appeals Commission.

If you wish to arrange a meeting to discuss your responses to this Notice of Deficiency, please contact Frank Popotnik at (330) 963-1198.

Sincerely,



Frank Popotnik
Environmental Supervisor
Division of Hazardous Waste Management, NEDO

FP:ddw

Attachment

cc: Tom Crepeau, DHWM, Central File, Ohio EPA
Harriet Croke, U.S. EPA, Region V
Ed Lim, Manager, Engineering & Risk Assessment Section, CO, Ohio EPA
Frank Popotnik, DHWM, NEDO, Ohio EPA
John Palmer, DHWM, NEDO, Ohio EPA
Rich Kurlich, DDGAW, NEDO, Ohio EPA

Attachment A
Ohio EPA Comments on
Landfill Closure Plan at
ASF - Keystone, Inc., Sebring Landfill

Comment Number	Location of Information	Comment
1	Page 4	ASF should include a discussion of the security at the Sebring site, both currently, and any changes that may be used once the contractor's equipment is onsite.
2	Page 8	Pursuant to ongoing discussions with Mr. Rich Kurlich (Division of Drinking and Groundwater), Table 2-2 should be revised to include those constituents that have been demonstrated as having a statistically significant concentration in the groundwater.
3	Page 9	Under 3.1, paragraph beginning <i>In order to...</i> , See comment number 9.
4	Page 10	Paragraph beginning <i>Sheet piling inspections...</i> should be clarified to indicate the number of additional surveys to be performed before going to a 5-year schedule. What is being proposed, as written, is unclear. This should be discussed with the new Ohio EPA representative.
5	Page 10	A paragraph should be added indicating that a sampling log will be maintained. A sample page (column headings, if in a bound notebook) should be included. It is probably most appropriate in section 3.3. It should include the test results or reference somehow, the test results as kept in a separate binder.
6	Page 13	Under 3.4, pursuant to ongoing discussions with Mr. Kurlich (DDAGW), the list of materials to be tested for should be revised to include those constituents that have been demonstrated as having a statistically significant concentration in the groundwater.
7	Page 13	Under 3.5, paragraph beginning <i>Additional access roads...</i> should be revised to clarify the wells being discussed are existing wells.
8	Page 13	Under 3.6, please make reference that air pollution control permits have been issued, and the permit number (as you did with the surface water permit).

- 9 Page 14 Indicates that monitoring wells will be maintained for a two-year monitoring period following completion of excavation. The monitoring period should be specified as two years of quarterly monitoring. Wording to this effect should be incorporated into the document. It may be necessary to extend the monitoring period if contamination is identified in the ground water or the facility fails to achieve clean closure.
- 10 Page 15 Paragraph beginning *In accordance with...* states *will provide written notice to John Palmer...* Ohio EPA personnel should not be mentioned by name. More generic language (eg., Ohio EPA or Ohio EPA, NEDO) should be used.
- 11 Page 16 Under 4.1, paragraph beginning *Reclamation of the material...*, last sentence reads *The materials that are sent from the landfill to the recycling center are purchased by the contractor* should have language specifically indicating when/where ownership of the material "changes hands".
- 12 Page 16 As previously discussed, ASF should incorporate language into Section 4 to include a discussion of a removal log. This log will be used to memorialize the removal of the materials and its destination. ASF has already submitted said language and a format for the log sheet via fax. At that time, Ohio EPA and ASF had an understanding that such a submittal was sufficient, provided upon submitting the revised closure plan, said changes were incorporated into the plan.
- 13 Page 18 Under 4.5, paragraph beginning *Nonconformance Reports...* there is a typo. The third line reads *...indeterminate quality due [to] deficiencies*. Please add the "to".
- 14 Page 18 Section 4.4 should have a section added making it clear that Ohio EPA must approve any field change request prior to instituting it.
- 15 Page 20 First bullet should be changed from *...TCLP tests...* to *...total tests...*
- 16 Page 20 Included within this discussion should be a determination of background and confirmation sampling plan.
- 17 Page 26 Paragraph begins *The reclamation process...* discusses the 2-year monitoring. Please refer to comment 9.

General Comments:

- 18 A global document change needs to be made. Reference to, and compliance with OAC rules 3745-65 and 66 should be changed such that the closure plan is in compliance with OAC rules 3745-54 and 55.
- 19 Outstanding is still the issue of the contaminants that have been demonstrated to be statistically significant. Those contaminants are not included in the list of contaminants of concern. The plan should be revised to include those contaminants.
- 20 ASF should include a discussion of protective measures planned to protect the integrity of Tecumseh Pond. This should include, but not be limited to worker protection during excavation as it approaches the separation berm, possible earthen dam (including discussion of Ohio Department of Natural Resources involvement, if any), and removal of material close to the berm without catastrophic failure. This issue is important as the pond provides water for a nearby trailer park.
- 21 A Sampling and Analysis Plan (SAP) needs to be developed in detail for the soil sampling performed during reclamation. The plan alludes to one, but does not provide sufficient detail.
- 22 Clean standards for clean closure of the bottom of the pit needs to be included. Keep in mind that these standards may be amended if need be, as the project proceeds.
- 23 Make global changes to document incorporating new name.



State of Ohio Environmental Protection Agency

STREET ADDRESS:

Lazarus Government Center
122 South Front St.
Columbus, OH 43215

TELE: (614) 644-3020 FAX: (614) 644-2329

MAILING ADDRESS:

Lazarus Government Center
P. O. Box 1049
Columbus, OH 43216-1049

CERTIFIED MAIL

JAN 14 2001

Bob Ribbing
Griffin Pipe Products
1400 Opus Place
Suite 700
Downer's Grove, IL 60515-5700

RE: CLOSURE PLAN APPROVAL, ASF-KEYSTONE, SEBRING LANDFILL
OHD 017-497-587

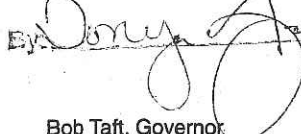
Dear Mr. Ribbing:

On June 2, 2000, ASF-Keystone submitted to Ohio EPA a closure plan for the Sebring Facility located at Lake Park Boulevard and Heacock Rd, Smith Township, Mahoning County. Revisions to the closure plan were received on the following dates: 3/16/01, 5/17/01, 9/14/01, 11/21/01, and 12/24/01. The closure plan was submitted pursuant to rule 3745-66-12 of the Ohio Administrative Code (OAC) in order to demonstrate that proposal for closure complies with the requirements of OAC rules 3745-66-11 and 3745-66-12. The owner or operator and the public were given the opportunity to submit written comments regarding the closure plan in accordance with the hazardous waste rule requirements. No public comments were received by Ohio EPA.

Based upon review of ASF-Keystone's submittal and subsequent revisions, I conclude that the closure plan for the hazardous waste facility at Lake Park Boulevard and Heacock Rd, Smith Township, Mahoning County, as modified herein, meets the performance standard contained in OAC rule 3745-66-11 and complies with the pertinent parts of OAC rule 3745-66-12.

The closure plan submitted to Ohio EPA on June 2, 2000 and revised on 3/16/01, 5/17/01, 9/14/01, 11/21/01, and 12/24/01 by ASF-Keystone is hereby approved.

I certify this to be a true and accurate copy of the
official records of the Ohio Environmental Protection Agency

By  1/14/02

Bob Taft, Governor
Maureen O'Connor, Lieutenant Governor
Christopher Jones, Director

ASF-KEYSTONE, SEBRING LANDFILL
PAGE - 2 -

Compliance with the approved closure plan, including the modifications specified herein, is expected. Ohio EPA will monitor such compliance. The director expressly reserves the right to take action, pursuant to chapters 3734. and 6111. of the Ohio Revised Code, and other applicable law, to enforce such compliance and to seek appropriate remedies in the event of noncompliance with the provisions and modifications of this approved closure plan. Please be advised that approval of this closure plan does not release ASF-Keystone from any responsibilities regarding corrective action for all releases of hazardous waste or constituents from any waste management unit, regardless of the time at which waste was placed in the unit.

You are hereby notified that this action of the Director of Environmental Protection is final and may be appealed to the Environmental Review Appeals Commission pursuant to Ohio Revised Code section 3745.04. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the commission within 30 days after notice of the director's action. Notice of the filing of the appeal shall be filed with the director within three days after the appeal is filed with the commission. An appeal may be filed with the commission at the following address:

Environmental Review Appeals Commission
236 East Town Street
Room 300
Columbus, Ohio 43215

When closure is completed, OAC rule 3745-66-15 requires the owner or operator of a facility to submit to the director of Ohio EPA, certification by the owner or operator and an independent, registered professional engineer, that the facility has been closed in accordance with the approved closure plan. The certification by the owner or operator shall include the statement found in OAC rule 3745-50-42(D). These certifications should be submitted to: Ohio Environmental Protection Agency, Division of Hazardous Waste Management, Attn: Pamela Allen, Information Technologies and Technical Support Section, P.O. Box 1049, Columbus, Ohio 43216-1049.

Ohio EPA, Division of Hazardous Waste Management, strongly encourages you to consider pollution prevention options for any processes at your facility that generate waste. While implementation of pollution prevention options is not required by Ohio laws and regulations, the application of waste minimization practices may help reduce the expense of remedial activities.

ASF-KEYSTONE, SEBRING LANDFILL
PAGE - 3 -

Additionally, implementation of pollution prevention options may prevent the creation of new units and as a result eliminate the requirement to submit a closure plan in the future. For assistance in identifying and implementing pollution prevention options, contact Ed D'Amato, DHWM, NEDO at (330) 963-1170.

Sincerely,



Christopher Jones
Director

cc: Pamela Allen, DHWM Central File, Ohio EPA
Ed Lim, Manager, Engineering & Risk Assessment Section, CO, Ohio EPA
Harriet Croke, USEPA - Region V
Ed D'Amato, DHWM, NEDO
Frank Popotnik, DHWM, NEDO
John Palmer, DHWM, NEDO

CJ/ED:ddw

RECEIVED
MAR 01 2002

RCRA RECORDS ROOM
Waste, Pesticides & Toxics Division
U.S. EPA—REGION 5



State of Ohio Environmental Protection Agency

P.O. Box 163669, 1800 WaterMark Dr.
Columbus, Ohio 43216-3669
(614) 644-3020
FAX (614) 644-2329

George V. Voinovich
Governor

January 10, 1995

Re: Receipt of Partial
Closure Plan
U.S. EPA ID No.
OHD017497587

American Steel Foundries
Attn: Mr. Terry Bradway
1001 East Broadway
Alliance, Ohio 44601

RECEIVED
WMD RECORD CENTER

FEB 21 1995

Dear Mr. Bradway :

With this letter the Ohio EPA acknowledges receipt of the hazardous waste partial closure plan submitted by RMT, Inc., for American Steel Foundries, Sebring Facility, Lake Park Boulevard and Heacock Road, Smith Township, Ohio. The closure plan concerns the facility's hazardous waste landfill. A public notice concerning receipt of this plan will appear the week of January 16, 1995 in the legal notice section of the Youngstown-Vindicator. The Director of Ohio EPA will act upon the plan after the close of the public comment period on February 20, 1995.

A copy of the partial closure plan will be available for public review at the Public Library of Youngstown and Mahoning County, Sebring Branch, 195 W. Ohio Avenue, Sebring, Ohio 44672, and at the Ohio EPA, Northeast District Office, 2110 E. Aurora Road, Twinsburg, Ohio 44087, tel: (216)963-1200.

Please contact John Palmer of the Northeast District Office if you have any questions on this matter.

Sincerely yours,

Thomas E. Crepeau, Manager
Data Management Section
Division of Hazardous Waste Management

cc. Harriet Croke, U.S. EPA, Region 5
Ed Kitchen, DHWM
John Palmer, NEDO



PUBLIC NOTICE

MAHONING COUNTY

NOTICE OF RECEIPT OF HAZARDOUS WASTE PARTIAL CLOSURE PLAN

Notice is hereby given of the receipt on December 20, 1994 of a hazardous waste partial closure plan from American Steel Foundries, Lake Park Boulevard and Heacock Road, Smith Township, Ohio, U.S. EPA I.D. No. OHD017497587. The plan concerns the hazardous waste landfill at the site indicated above. A copy of the facility's partial closure plan will be available for public review at the Public Library of Youngstown and Mahoning County, Sebring Branch, 195 W. Ohio Avenue, Sebring, Ohio 44672, and at the Ohio EPA, Northeast District Office, 2110 E. Aurora Road, Twinsburg, Ohio 44087, tel: (216)963-1200. Comments concerning the partial closure plan may be submitted within 30 days of this notice to the Ohio EPA, Division of Hazardous Waste Management, Attn: Data Management Section, 1800 Watermark Dr., Columbus, Ohio 43216-1049, tel: (614) 644-2977.



State of Ohio Environmental Protection Agency

Northeast District Office

2110 E. Aurora Road
Twinsburg, Ohio 44087-1969
(616) 425-9171
FAX (216) 487-0769

George V. Voinovich
Governor

November 9, 1994

RE: AMERICAN STEEL
MAHONING COUNTY
OHD 017 497 587

CERTIFIED MAIL

Ms. Bernadette M. Wellman
American Steel Foundries, Inc.
10 South Riverside Plaza
10th Floor
Chicago IL 60606

RECEIVED
WMD RECORD CENTER

JAN 06 1995

Dear Ms. Wellman:

I am writing in reference to Ohio EPA's communications dated October 21, 1994, and October 31, 1994, regarding Ohio EPA's decision to require a Sealed Double Ring Infiltrometer test per ASTM methods rather than testing suggested by Gordon P. Boutwell.

This decision is site specific. Ohio EPA is allowing American Steel Foundries to cap hazardous waste with a solid waste style cap. Ohio EPA is concerned that this cap provide adequate protection from infiltration of surface waters and precipitation.

The Agency feels that it is essential to ensure that the clay cap permeability meets specifications. To that end, the Agency is requiring American Steel Foundries to use an approved (ASTM) method for the test pad permeability analysis. As of this date, "Boutwells" are not an approved method. "SDRI" is an approved method.

If at the time of actual construction of the test pad other ASTM approved methods are available, American Steel Foundries may propose to use the alternate tests then.



RECEIVED

NOV 14 1994

OFFICE OF RCRA
WASTE MANAGEMENT DIVISION
EPA, REGION V

Page -2-

Ms. Bernadette M. Wellman
November 9, 1994

I hope this clarifies the Agency's position at this site. If you have any further questions, please feel free to contact either Mr. Harry Courtright at (216) 963-1119 or me at (216) 963-1232.

Sincerely,



John B. Palmer
Environmental Specialist
Division of Hazardous Waste Management

JBP.cl

pc: Harry Courtright, DHWM, NEDO
Laurie Stevenson, DHWM, CO
David Stroh, DHWM, CO
Mark Navarre, Legal, CO
Lori Massey, AGO
James Payne, AGO
Gordon Garcia, USEPA Region V
Eric Adams, DDAGW, NEDO
Terry Bradway, ASF



State of Ohio Environmental Protection Agency

Northeast District Office

1110 E. Aurora Road
Cincinnati, Ohio 44087-1969
(216) 425-9171
(216) 487-0769

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NOV 3 1994

OFFICE OF RCRA
WASTE MANAGEMENT DIVISION
EPA, REGION V

George V. Voinovich
Governor

November 1, 1994

RE: AMERICAN STEEL
MAHONING COUNTY
OHD 017 497 587

CERTIFIED MAIL

Ms. Bernadette M. Wellman
American Steel Foundries, Inc.
10 South Riverside Plaza
10th Floor
Chicago, IL 60606

RECEIVED
WMD RECORD CENTER

JAN 06 1995

Dear Ms. Wellman:

I am writing in reference to Ohio EPA's communication dated October 21, 1994 regarding Ohio EPA's response to questions that American Steel Foundries had on the Sebring Township facility.

Based on new information transmitted to this inspector, and on a further review of technical issues with Agency engineers, Ohio EPA has decided to modify Comment Fifteen to read as follows:

- 15) The STEI Two-Stage Borehole Field Permeability Test as presented by Gordon P. Boutwell at the March 12, 1992 seminar sponsored by the Geotechnical Committee of the Houston Branch of the ASCE is not acceptable at this time. American Steel Foundries shall use a Sealed Double Ring Infiltrometer test per ASTM methods.

American Steel Foundries is strongly encouraged to run "Boutwell" tests side by side with the SDRI, to show equivalency.

I hope that this modification will not inconvenience you and your consultants in the preparation of the revised closure plan.

If you have any questions please feel free to contact either Mr. Harry Courtright at (216) 963 1119 or me at (216) 963 1232.

Sincerely,

John B. Palmer
Environmental Specialist
Division of Hazardous
Waste Management

JBP:cil

pc: Harry Courtright, DHWM, NEDO
Laurie Stevenson, DHWM, CO
David Stroh, DHWM, CO
Mark Navarre, Legal, CO
Lori Massey, AGO
James Payne, AGO
✓ Gordon Garcia, USEPA, Region V
Eric Adams, DDAGW, NEDO
Terry Bradway, ASF



State of Ohio Environmental Protection Agency

Northeast District Office

2110 E. Aurora Road
Mansfield, Ohio 44887-1969
(616) 425-9171
AX (216) 487-0769

TRACKING - DHWM, CM&ES

TO GO ON: ☒ RCRIS ☐ FO LOG ☐ USEPA LOG ☐ CJ LOG ☐ FILE
ENTERED: ☒ RCRIS ☐ FO LOG ☐ USEPA LOG ☐ CJ LOG ☐ ONLY
RCRIS ENTRY CODES: (EVALUATION) 014 (ENFORCEMENT) 022
CEI ☒ CI ☐ OTHER ☐ INITIAL NOV ☐ FOLLOW-UP NOV ☐
FULL RTC ☐ PARTIAL RTC ☐ LDR ☐ SENT TO USEPA: YES ☐ NO ☐

DIVISION of

HAZARDOUS WASTE MGT.

George V. Voinovich
Governor

RECEIVED
WMD RECORD CENTER

January 20, 1994

JUL 19 1994

RE: AMERICAN STEEL
MAHONING COUNTY
SMITH TOWNSHIP
OHD 017 497 587

CERTIFIED MAIL

Mr. Terry Bradway
American Steel Foundries, Inc.
1001 East Broadway
Alliance OH 44601-0060

NOTICE OF VIOLATION

Dear Mr. Bradway:

On January 11, 1994, Karen Nesbit and I, representing the Ohio EPA, conducted an inspection for compliance with hazardous waste regulations at American Steel Foundries, Inc.'s Smith Township facility. You represented the American Steel Foundries, Inc. facility.

The facility is the subject of an enforcement action. On December 1, 1992, a consent decree, The United States v. Amsted Industries, Inc. Civil Action No. C87-1284A, was entered. The January 11, 1994 inspection further addressed American Steel Foundries' compliance with this consent decree.

A copy of our check sheets is enclosed for your information.

At the time of the inspection, the facility was determined to be a land disposal facility. The facility at the time of the inspection was neither generating hazardous wastes on site nor receiving hazardous wastes from off site. The facility was inspected for compliance with applicable hazardous waste regulations. The inspection revealed that American Steel Foundries, Inc. is in violation of at least the following regulations:

Violations

1. American Steel Foundries has failed to provide an annual refresher training course for employees responsible for the management of hazardous waste in violation of OAC Rule 3745-65-16 (C).

The last RCRA oriented training American Steel Foundries appears to have provided was on December 23, 1992.

American Steel Foundries shall abate this violation by providing the required refresher training. American Steel Foundries shall document compliance by sending copies of the sign off sheets indicating that the appropriate personnel have

Page -2-
Mr. Terry Bradway
January 20, 1994

been trained to the Ohio EPA's Northeast District Office.

This violation must be corrected and documentation of all the corrections must be sent to this office to my attention by February 18, 1994.

(The land disposal facility is required to undergo closure. This closure has not yet been certified. A Closure Plan has been submitted by American Steel Foundries. This Closure Plan is currently under review by the Ohio EPA.

The following violations must be cited because the facility has not yet certified closure. The Ohio EPA is not requiring a response to these violations in the documentation American Steel Foundries must submit by February 18, 1994. The Ohio EPA will recognize continued compliance with the December 1, 1992 consent decree, The United States v. Amsted Industries, Inc. Civil Action No. C87-1284A as satisfactory interim abatement of these violations. American Steel Foundries is advised, however, that it is responsible for compliance with all applicable regulations.)

2. American Steel Foundries has failed to provide run-on control capable of handling at least a 25 year storm in violation of OAC 3745-68-02 (A).
3. American Steel Foundries has failed to provide run-off control capable of handling at least a 25 year storm in violation of OAC 3745-68-02 (B).
4. American Steel Foundries has failed to provide controls to prevent wind dispersal of hazardous waste in violation of OAC 3745-68-02 (D).
5. American Steel Foundries has failed to maintain and operate the facility in a manner which minimizes the possibility of a non-sudden release of hazardous waste or hazardous waste constituents in violation of OAC Rules 3745-65-31.
6. The Smith Township Facility is an unpermitted hazardous waste disposal facility in violation of ORC Rule 3734.02.

American Steel Foundries shall begin to abate these violations by adhering to the terms and conditions of the USEPA consent decree noted above. American Steel Foundries shall abate these violations by certifying closure of the facility.

American Steel Foundries appeared to be in compliance with the following sections of the December 1, 1992 Consent Decree:

Page -3-
Mr. Terry Bradway
January 20, 1994

Section V. D., Numbers 1, 2, and 3;
Section V. E., Numbers 1, 2, 3, 4, and 8;
Section V. F., Numbers 1, 2, 3, 4, and 5.

American Steel Foundries is subject to Ohio's rules concerning financial assurance for hazardous waste facility closure care and liability coverage. Under OAC rules 3745-55-42, 3745-55-43 and 3745-55-47 and/or 3745-66-42, 3745-66-43 and 3745-66-47, and Section V. D. Number 4 of the December 1, 1992 Consent Decree, American Steel Foundries must establish and maintain a closure cost estimate, financial assurance for closure care, and liability coverage for sudden accidental discharges. These regulations and any potential violations will be addressed under a separate cover.

Section V. E., Numbers 5, 6, and 7 of the Consent Decree did not appear to be applicable at the time of the inspection. American Steel Foundries is awaiting laboratory results from a round of ground water sampling conducted in December 1993. At the time of the receipt of these data, American Steel Foundries will be subject to the requirements of at least Number 5 of this Section.

Failure to list specific deficiencies in this communication does not relieve you from the responsibility of complying with all applicable regulations. Please be advised that present or past instances of non-compliance can continue as subjects of pending or future enforcement actions.

If you have any questions, please feel free to contact either Mr. Harry Courtright or me at (216) 963 1200.

Sincerely,



John B. Palmer
Environmental Specialist
Division of Solid and Hazardous Waste Management

JP.wk

cc: Harry Courtright, DHWM, NEDO
Laurie Stevenson, DHWM, CO
David Stroh, DHWM, CO
Mark Navarre, Legal, CO
Lori Massey, AGO
Chief, RCRA Enforcement Branch, USEPA Region V
Barbara Mazur, USEPA Region V



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FEB 01 1994

American Steel Foundries

1001 EAST BROADWAY * P. O. BOX 2060 * ALLIANCE, OHIO 44601

(216) 823-6150 * FAX NO. (216) 821-4568

January 11, 1994

Certified Mail

P 069 816 957

Director
Ohio Environmental Protection Agency
P.O. Box 1049
Columbus, Ohio 43266-0149

P 069 816 958

Mr. John Palmer
Environmental Specialist
Division of Hazardous Waste Management
Northeast District Office
2110 E. Aurora Road
Twinsburg, Ohio 44087-1969

Gentlemen:

UNITED STATES V. AMSTED INDUSTRIES, INC.
CIVIL ACTION NO. C87 - 1284A (N.D. OHIO)
ELECTRIC ARC FURNACE CLOSURE PLAN

Mr. John Palmer's attached letter of December 21, 1993 has been received and evaluated. He reflects our concerns and agrees that weather conditions and approval of the document for the Background Sampling Analysis for Electric Arc Furnace Baghouse Hazardous Waste Management Unit already had an adverse effect on our ability to complete the closure within the (180) day closure requirement. We, in turn, respect the OEPA's desire to allocate appropriate time to review the additional sampling data requested by the OEPA and submitted by American Steel Foundries on November 08, 1993.

Therefore, we respectfully request that the OEPA extend the closure period for the subject area to September 01, 1994 without penalty to the ASF under the October 04, 1993 approval.

The proposed extension would provide advantages for both parties.

American Steel Foundries would have preferred to complete closure during the non-operating holiday period but, due to this delay, would like to complete the closure at the next non-operating period. This would be our annual vacation shutdown, which is scheduled for August 1994. Less interference from normal plant operations will permit a faster and more efficient closure.

OEPA would have sufficient time to thoroughly review the submitted documentation. However, it is our understanding, that should OEPA fail to approve the submitted documentation in sufficient time for ASF to mobilize for the vacation shutdown period, that an additional extension, without penalty to the ASF, would be a reasonable consideration of the OEPA.

American Steel Foundries is preparing for closure and will proceed toward that end. However, we will await your decision and trust that our concerns will be considered.

Should you have any additional requests, comments or concerns, please do not hesitate to call Mr.T.C.Bradway at (216) 823-6150 Ext. 206.

cc: CAR
DJM
VTH
EJB
RML
RBR
TCB

Very truly yours,


J.F. Qesch
Plant Manager

Chief RCRA Enforcement Branch, 5HR-12
U.S. EPA, Region V
230 S. Dearborn St.
Chicago, Illinois 60604
Attention: James Saric

P 069 816 959

Chief, SWERB Section V
Office of Regional Counsel
U.S. EPA Region V, 5CS-TUB3
77 West Jackson Blvd.
Chicago, Illinois 60604
Attention: Richard Clarizio

P 069 816 960

P. C. Schillawski
Squire Sanders & Dempsey
4900 Society Center
127 Public Square
Cleveland, Ohio 44114-1304

P 069 816 961

Attachment



American Steel Foundries

1001 EAST BROADWAY • P. O. BOX 2060 • ALLIANCE, OHIO 44601

(216) 823-6150 • FAX NO. (216) 821-4568

June 3, 1993

RECEIVED
JUN 7 1993

CERTIFIED LETTER P 069 816 819
RETURN RECEIPT REQUESTED

OFFICE OF RCRA
WASTE MANAGEMENT D
EPA REGION

Ohio Environmental Protection Agency
Division of Hazardous Waste Management
P. O. Box 1049
Columbus, Ohio 43266-0149
Attn: Mr. Tom Crepeau
Manager - Data Management Section

Dear Sir:

UNITED STATES V. AMSTED INDUSTRIES, INC.
CIVIL ACTION NO. C87 - 128A (N.D. OHIO)

SUBJECT: CLOSURE PLAN
AMERICAN STEEL FOUNDRIES
EAF BAGHOUSE AREA
OHD 981090418

On January 26, 1993, American Steel Foundries submitted an EAF Closure Plan to Federal EPA, the Ohio EPA and all other stated parties in accordance with the requirements of the United States V. Amsted Industries, Inc., Civil Action No. C87-128A (N. D. Ohio).

We are, at this time, formally resubmitting the corrected plan, including a revised Closure Cost Estimation, in accordance with Mr. Donald R. Schregardus's OEPA "Notice of Deficiency" letter to Mr. T. C. Bradway, American Steel Foundries dated May 5, 1993.

Ms. M. L. Hall, representing our consultant, RMT Inc., has worked with Mr. John Palmer at OEPA's Northeast District Office at Twinsburg, Ohio and she believes the issues have been correctly addressed. However, should you have any problems or concerns, please do not hesitate to call Mr. T. C. Bradway at (216) 823-6150, Ext 206.

CERTIFICATION

"I certify that the information contained in or accompanying this submission or document is true, accurate, and complete to the best of my knowledge. As to those identified portions(s) of this submission or document for which I cannot personally verify its truth and accuracy, I certify as the company official having supervisory responsibility for the person(s) who, acting under my instructions, made the verification, that this information is true, accurate, and complete to the best of my knowledge".

Yours very truly,


J. A. Difloure
PLANT MANAGER

TCB/sdw

Attachments: Plan includes
1 book

cc: Div. of Solid and Hazardous Waste P 069 816 820
Northeast District Office
2110 East Aurora Road
Twinsburg, Ohio 44087-1969
Attention: John Palmer

Chief RCRA Enforcement Branch, 5HR-12 P 069 816 821
U. S. EPA, Region V
77 West Jackson Blvd.
Chicago, Illinois 60604
Attention: Kimberly Oogle

Chief, SWERB Section V P 069 816 822
Office of Regional Counsel
U. S. EPA Region V, 5CS-TUB3
77 West Jackson Blvd.
Chicago, Illinois 60604
Attention: Richard Clarizio

Edward J. Brosius, Esq.
AMSTED Industries, Inc.
44th Floor - Boulevard Towers South
205 N. Michigan Ave.
Chicago, Illinois 60601

American Steel Foundries
10 South Riverside Plaza - 10th Floor
Chicago, Illinois 60606
Attn: Mr. C. A. Ruud

UNITED STATES V. AMSTED INDUSTRIES, INC. CIVIL ACTION NO. C87 - 128A (N.D. OHIO)

Mr. P. C. Schillawski P 069 816 823
Squire, Sanders & Dempsey
4900 Society Center
127 Public Square
Cleveland, Ohio 44114-1304

Mr. E. R. Hanson
American Steel Foundries
Manufacturing Research Engineering Center
3761 Canal Street
East Chicago, Indiana 46312



American Steel Foundries

1001 EAST BROADWAY * P. O. BOX 2060 * ALLIANCE, OHIO 44601

(216) 823-6150 * FAX NO. (216) 821-4568

May 27, 1993

RECEIVED
JUN 1 1993

OFFICE OF RCRA
WASTE MANAGEMENT
EPA REGION 5

**CERTIFIED LETTER
RETURN RECEIPT REQUESTED**

Chief RCRA Enforcement Branch, 5HR-12 P 069 816 813
U.S. EPA, Region V
77 West Jackson Blvd.
Chicago, Illinois 60604
Attention: Kimberly Ogle

Chief, SWERB Section V P 069 816 814
Office of Regional Counsel
U.S. EPA Region V, 5CS-TUB3
77 West Jackson Blvd.
Chicago, Illinois 60604
Attention: Richard Clarizio

Gentlemen:

**UNITED STATES V. AMSTED INDUSTRIES, INC.
CIVIL ACTION NO. C87 - 128A (N.D. OHIO)**

Enclosed please find "Addendum #1 Test Plot Plan" for the Sebring Landfill Closure and Post-Closure Plan.

In accordance with the Consent Decree requirements, Section:
D. Sebring Facility - Closure and Post Closure Requirements, Item #1, a Sebring Landfill Closure Plan was submitted for approval under certified letter dated February 10, 1993 to all persons as specified within the Consent Decree. In that letter, AMSTED Industries Inc. asked that a notation be made within Section 6, Alternate Material, explaining that Field Trial Test Plot Plan and Specifications for Alternate Foundry Material Test Plots at the site would be submitted. Due to delays between the consultants and AMSTED Industries, Inc., the target submittal date set by American Steel Foundries has been exceeded and we are, by this letter, formally submitting this addendum.


CERTIFICATION

"I certify that the information contained in or accompanying this submission or document is true, accurate, and complete to the best of my knowledge. As to those identified portion(s) of this submission or document for which I cannot personally verify its truth and accuracy, I certify as the company official having supervisory responsibility for the person(s) who, acting under my instructions, made the verification, that this information is true, accurate, and complete to the best of my knowledge."

Yours very truly,

TCB:jlmm

Attachments: Plan includes
1 Book


J. A. Difloure
Plant Manager

cc: Ohio EPA
Chief, Div. of Solid and Hazardous Waste
1800 WaterMark Drive
P. O. Box 1049
Columbus, Ohio 43268-0149

P 069 816 815

Ohio EPA
Div. of Solid and Hazardous Waste
Northeast District Office
2110 East Aurora Road
Twinsburg, Ohio 44087-1969

P 069 816 816

Edward J. Brosius, Esq.
AMSTED Industries, Inc.
44th Floor - Boulevard Towers South
205 N. Michigan Ave.
Chicago, Illinois 60601

American Steel Foundries
10 South Riverside Plaza - 10th Floor
Chicago, Illinois 60606
Attn: Mr. C. A. Ruud

Mr. P. C. Schillawski
Squire, Sanders & Dempsey
4900 Society Center
127 Public Square
Cleveland, Ohio 44114-1304

P 069 816 817

Mr. E. R. Hanson
American Steel Foundries
Manufacturing Research Engineering Center
3761 Canal Street
East Chicago, Indiana 46312



State of Ohio Environmental Protection Agency

P.O. Box 1049, 1800 WaterMark Dr.
Columbus, Ohio 43266-0149
(614) 644-3020
FAX (614) 644-2329

RECEIVED JUN 18 1993
WMD RCRA
RECORD CENTER *Pass A*

George V. Voinovich
Governor

Donald R. Schregardus
Director

February 26, 1993

Re: American Steel Foundries
US EPA ID No.: OHD017497587
Receipt of Closure Plan

American Steel Foundries
Attn: Mr. Terry Bradway
1001 East Broadway
Alliance, Ohio 44601

Dear Mr. Bradway:

A public notice acknowledging the Ohio EPA's receipt of a closure plan for Amsted Industries, Inc. (DBA) American Steel Foundries located at Lake Park Boulevard and Heacock Road, Alliance, Ohio 44601 will appear the week of March 1, 1993 in the Youngstown Vindicator, Youngstown, Ohio. The Director of Ohio EPA will act upon the closure plan request following the close of the public comment period, April 7, 1993.

Copies of the closure plan will be available for public review at the Public Library of Youngstown and Mahoning County, 305 Wick Avenue, Youngstown, Ohio 44503 and the Ohio EPA, Northeast District Office, 2110 East Aurora Road, Twinsburg, Ohio 44087.

Please contact Randy Sheldon at (614) 644-2977, should you have any questions concerning this matter.

Very truly yours,

Thomas E. Crepeau

Thomas E. Crepeau, Manager
Data Management Section
Division of Hazardous Waste Management

TEC/RS/ds

cc: Harriet Croke, US EPA, Region V
Randy Meyer, RCRA TAS, DHWM
Paul Anderson, NEDO, DHWM

.../sheldon/wp-92/closereceit



PUBLIC NOTICE

Mahoning County

RECEIPT OF HAZARDOUS WASTE CLOSURE PLAN

For: Amsted Industries, Inc. (DBA) American Steel Foundries, Lake Park Boulevard, Alliance, Ohio 44601, US EPA ID No.: OHD017497587. Pursuant to OAC Rule 3745-66-10 thru 17 and 40 CFR, Subpart G, 265.110 thru 117, the Ohio Environmental Protection Agency (OEPA) is hereby giving notice of the receipt of a Hazardous Waste Facility Closure Plan involving the Hazardous Waste Landfill for the above referenced facility. Ohio EPA is also giving notice that this facility is subject to a determination concerning corrective action, a requirement under the Hazardous and Solid Waste Amendments of 1984, which concerns any possible uncorrected releases of hazardous waste or hazardous constituents to the environment from any current or previous solid waste management units at the above facility. A corrective action determination is required from hazardous waste facilities intending to close.

Copies of the facility's closure plan will be available for public review at the Public Library of Youngstown and Mahoning County, 305 Wick Avenue, Youngstown, Ohio 44503 and Ohio EPA, Northeast District Office, 2110 East Aurora Road, Twinsburg, Ohio 44087. Comments concerning this plan or factual information concerning any releases of hazardous waste or hazardous waste constituents by the above facility requiring corrective action should be submitted within 30 days of this notice to: Ohio Environmental Protection Agency, Division of Hazardous Waste Management, Data Management Section, Attn: Thomas E. Crepeau, PO Box 1049, Columbus, Ohio 43266-0149 and Ohio Environmental Protection Agency, Northeast District Office, 2110 East Aurora Road, Twinsburg, Ohio 44087.



American Steel Foundries

1001 EAST BROADWAY * P. O. BOX 2060 * ALLIANCE, OHIO 44601

(216) 823-6150 * FAX NO. (216) 821-4568

February 10, 1993

RECEIVED

FEB 17 1993

**CERTIFIED LETTER
RETURN RECEIPT REQUESTED**

OFFICE OF RCRA
Waste Management Division
U.S. EPA, REGION V

Chief RCRA Enforcement Branch, 5HR-12
U.S. EPA, Region V
77 West Jackson Blvd.
Chicago, Illinois 60604
Attention: Kimberly Ogle

P 134 874 036 P 134 874 082

Chief, SWERB Section V
Office of Regional Counsel
U.S. EPA Region V, 5CS-TUB3
77 West Jackson Blvd.
Chicago, Illinois 60604
Attention: Richard Clarizio

P 134 874 034 P 134 874 081

Gentlemen:

**UNITED STATES V. AMSTED INDUSTRIES, INC.
CIVIL ACTION NO. C87 - 1284A (N.D. OHIO)**

Enclosed please find the Closure and Post-Closure plans and appendices for the Sebring facilities. This submittal is intended to meet the requirements of the consent decree. The numbering of each item conforms with the consent decree sequence. Landfill Closure Plan drawings are being sent as a separate attachment.

D. SEBRING FACILITY - CLOSURE AND POST CLOSURE REQUIREMENTS

1. Within seventy-five (75) days after the entry of this decree, defendant shall submit to Ohio EPA, with a copy to U.S. EPA, a Sebring Closure Plan for its Sebring Facility that provides for closure as a landfill in accordance with 40 C.F.R., SS 265.112 and 265.310, and Administration Code SS 3745-66-12 and 68-10, and other applicable requirements (except to the extent that Ohio EPA determines that a Closure Plan required by this subparagraph need not satisfy all requirements of 40 C.F.R. S 265.310 and Ohio Admin. Code S 3745-68-10. Within ninety (90) days after the entry of this decree, defendant shall submit to the Ohio EPA, with a copy to U.S. EPA, a Sebring Post-Closure Plan, that provides for compliance with the requirements of 40 C.F.R. SS 265.117 through 265.120 and Ohio Admin. Code SS 3745-66-17 through 20, in the event that "Clean Closure" of the Sebring Facility cannot be achieved.

UNITED STATES V. AMSTED IND., INC. CIVIL ACTION NO. C87-1284A (N.D.OHIO)

LANDFILL CLOSURE PLAN

Please make the following notation to the landfill Closure Plan:

Section 6
ALTERNATE MATERIALS

This section will be amended to include field trial test plot plans and specifications for alternate foundry material test plots at the site. These plans and specifications will be submitted for your approval on or before May 1, 1993 so that approval for test plot installation can be achieved on or before June 1, 1993 in order to be in accord with the 1993 vegetation growing season.

CERTIFICATION

"I certify that the information contained in or accompanying this submission or document is true, accurate, and complete to the best of my knowledge. As to those identified portion(s) of this submission or document for which I cannot personally verify its truth and accuracy, I certify as the company official having supervisory responsibility for the person(s) who, acting under my instructions, made the verification, that this information is true, accurate, and complete to the best of my knowledge."

Yours very truly,

J. A. Difloure
PLANT MANAGER

Signed in his absence

By: T.C. Bradway
T. C. Bradway
FACILITIES ENGINEER

TCB/sdw
Attachments: Plan Includes
2 Books
1 Set Drawings

UNITED STATES V. AMSTED IND., INC. CIVIL ACTION NO. C87-1284A (N.D.OHIO)

cc: Ohio EPA P 134 874 011 P 069 815 814
Chief, Division of Solid and Hazardous Waste
1800 WaterMark Drive
P.O. Box 1049
Columbus, Ohio 43268-0149

Ohio EPA P 134 874 014 P 134 874 024
Division of Solid and Hazardous Waste
Northeast District Office
2110 East Aurora Road
Twinsburg, Ohio 44087-1969

Edward J. Brosius, ESQ.
Amsted Industries, Inc.
44th Floor - Boulevard Towers South
205 N. Michigan Ave.
Chicago, Illinois 60601

American Steel Foundries
10 South Riverside Plaza - 10th Floor
Chicago, Illinois 60606
Attn: C. A. Ruud

P. C. Schillawski P 134 874 015 P 134 874 023
Squire Sanders & Dempsey
4900 Society Center
127 Public Square
Cleveland, Ohio 44114-1304

E. R. Hanson
American Steel Foundries
Manufacturing Research Engineering Center
3761 Canal Street
East Chicago, Indiana 46312



American Steel Foundries

1001 EAST BROADWAY * P. O. BOX 2060 * ALLIANCE, OHIO 44601

(216) 823-6150 * FAX NO. (216) 821-4568

January 26, 1993

RECEIVED
FEB 02 1993

OFFICE OF RCRA
Waste Management Division
U.S. EPA, REGION V

**CERTIFIED LETTER
RETURN RECEIPT REQUESTED**

Chief, RCRA Enforcement Branch, 5HR-12
U.S. EPA, Region V
77 West Jackson Blvd.
Chicago, Illinois 60604
Attention: Kimberly Ogle

P 134 874 022

Chief, SWERB Section V
Office of Regional Counsel
US EPA Region V, 5CS-TUB3
77 West Jackson Blvd.
Chicago, Illinois 60604
Attention: Richard Clarizio

Gentlemen:

**UNITED STATES V. AMSTED INDUSTRIES, INC.
CIVIL ACTION NO. C87-1284A (N.D. OHIO)**

This submittal is intended to meet the progress requirements of the Consent Decree. The numbering of each item conforms with the Consent Decree sequence.

V. COMPLIANCE REQUIREMENTS

C. Alliance Facility - Treatment, Storage and Disposal Requirements:

2. Within 60 days of the entry of the decree, defendant shall develop and submit to Ohio EPA for approval, with a copy to U.S. EPA, a Closure Plan, in accordance with 40 C.F.R. SS 265.111 thru 265.116, and Ohio Admin. Code S3748-66-11 thru 16, for the Electric Arc Furnace Dust Hazardous Waste Management Unit (Alliance Closure Plan) at the Alliance facility.

The subject closure plan for the Electric Arc Furnace Baghouse Hazardous Waste Management Unit is attached.

UNITED STATES V. AMSTED IND., INC. CIVIL ACTION # C87-1284A
(N.D.OHIO)

P. C. Schillawski
Squire Sanders & Dempsey
4900 Society Center
127 Public Square
Cleveland, Ohio 44114-1304

E. R. Hanson
American Steel Foundries
Manufacturing Research Engineering Center
3761 Canal Street
East Chicago, Indiana 46312

UNITED STATES V. AMSTED IND., INC. CIVIL ACTION # C87-1284A
(N.D.OHIO)

VII. SUBMITTALS

- B. Any correspondence that is to be directed to the defendant shall be sent to the following:

Please substitute Mr. T. C. Bradway for Mr. W. D. Heestand at the Alliance, Ohio address as Mr. Heestand is no longer with our organization.

CERTIFICATION

I certify that the information contained in or accompanying this submission or document is true, accurate, and complete to the best of my knowledge. As to those identified portion(s) of this submission or document for which I cannot personally verify its truth and accuracy, I certify as the company official having supervisory responsibility for the person(s) who, acting under my instructions, made the verification, that this information is true, accurate, and complete, to the best of my knowledge.

Very truly yours,

TCB:jlm

Attachments


J. A. Difloure
Plant Manager

cc: Ohio EPA
Chief, Div. of Solid & Haz. Waste
1800 WaterMark Drive
P. O. Box 1049
Columbus, Ohio 43265-0149

Ohio EPA
Div. of Solid & Haz. Waste
Northeast District Office
2110 East Aurora Road
Twinsburg, Ohio 44087-1969

Edward J. Brosius, Esq.
AMSTED Industries, Inc.
44th Floor - Boulevard Towers South
205 N. Michigan Ave.
Chicago, Illinois 60601

American Steel Foundries
10 South Riverside Plaza - 10th Floor
Chicago, Illinois 60606
Attn: C. Ruud

TABLE 1
CLOSURE COST ESTIMATE
ASF - BROADWAY STREET FACILITY, ALLIANCE, OHIO

UNIT OF MAJOR ACTIVITY	TASK	UNIT	QUANTITY	UNIT COST	EXTENSION
CONTRACTOR IMPLEMENTATION					
Mobilization	----	Lump Sum	1	\$1,000	\$1,000
Labor and Equipment	Excavation, decontamination and backfilling beneath the baghouse	Days	5	\$2,500	\$12,500
Decontamination Pad Construction	Construction and dismantling of the decontamination pad	Lump Sum	1	\$2,500	\$2,500
Concrete Pad Construction	Concrete pad and curbing construction	Lump Sum	1	\$10,000	\$10,000
RESIDUALS MANAGEMENT					
Solid Hazardous Waste	Off-site transport and treatment of solid wastes	Cubic Yards	90	\$300	\$27,000
Rinsate	Off-site transport and treatment of rinsate	Gallons	110	\$0.40	\$44.00
DOCUMENTATION ACTIVITIES					
On-Site Engineering Documentation	----	Lump Sum	1	\$5,000	\$5,000
Soil Sampling	----	Lump Sum	1	\$3,000	\$3,000
Soil Analysis	----	Sample	26	\$100	\$2,600
Rinsate Analysis	----	Sample	2	\$2,000	\$4,000
Documentation Report	----	Lump Sum	1	\$5,000	\$5,000
CLOSURE COST					\$72,600
Contingency	---	Lump Sum	1	15%	\$10,890
TOTAL CLOSURE COSTS					\$83,490



State of Ohio Environmental Protection Agency

Northeast District Office

100 E. Aurora Road
Cincinnati, Ohio 44087-1969
(216) 425-9171
FAX (216) 487-0769

Stamps - for Records Center
Rec'd 11/4/92
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OCT 20 1992

George V. Voinovich
Governor

Donald R. Schregardus
Director
**OFFICE OF REGIONAL
WASTE MANAGEMENT DIVISION
EPA, REGION V**

October 13, 1992

RE: AMERICAN STEEL
MAHONING COUNTY
OHD 017 497 587

CERTIFIED MAIL

Mr. William Heestand
American Steel Foundries, Inc.
1001 East Broadway
Alliance, OH 44601-0060

Dear Mr. Heestand:

On October 5, 1992, this office received a request from American Steel Foundries to proceed with processing of material stored at the landfill and to begin to fill the landfill to grade.

The Ohio EPA advises American Steel Foundries that to proceed with activities at the landfill prior to receiving the Director's approval on a closure plan is premature. The facility should wait for closure plan approval before disturbing materials at the landfill.

If you have any questions, please feel free to contact either Mr. Harry Courtright or me at (216) 963-1200.

Sincerely,

John B. Palmer
Environmental Specialist
Division of Hazardous Waste Management

JBP.wb

cc: Harry Courtright, DHWM, NEDO
Laurie Stevenson, DHWM, CO
David Stroh, DHWM, CO
Mark Navarre, Legal, CO
Lori Massey, AGO
James Payne, AGO
Section Chief, USEPA Region V



State of Ohio Environmental Protection Agency

Northeast District Office

10 E. Aurora Road
Twinsburg, Ohio 44087-1969
(216) 425-9171
FAX (216) 487-0769

Rich 12/3
FYI
sent copy to K.S. + S.B.
CATHERINE

Richard F. Celeste
Governor

November 23, 1990

RE: AMERICAN STEEL
FOUNDRIES (ASF)
SEBRING, OHIO
MAHONING COUNTY
LDF
OHD

Catherine McCord
USEPA - 5HR-12
230 S. Deerborn
Chicago, Il 60604

Dear Mrs. McCord:

As per our telephone call conversation on November 21, 1990, I am enclosing Ohio EPA new changes to rules 3745-65-92 and 93 of the Ohio Administrative Code (OAC) and a copy of American Steel Foundries recycle closure submittal for your use.

I will like to confirm our tentative scheduled conference call on Thursday November 29, 1990. You have indicated that you will be calling Mr. Ed Kitchen to inform him of the call.

Should you have any questions, please contact our office at (216) 425-9771.

Sincerely,

Ahmed A. Mustafa
Environmental Geologist
Division of Solid and Hazardous Waste
Management

AAM/fn

cc: Dave Wertz, DSHWM, NEDO
Harry Courtright, DSHWM, NEDO
Ed Kitchen, DSHWM, CO
Jeff Mayhugh, DSHWM, CO

AMSTED INDUSTRIES

INCORPORATED

44TH FLOOR - BOULEVARD TOWERS SOUTH
205 NORTH MICHIGAN AVENUE - CHICAGO, ILLINOIS - 60601

LAW DEPARTMENT

RECEIVED

APR 24 1987

U.S. EPA REGION V

WRITER'S DIRECT DIAL NUMBER
AREA CODE 312/ 819-8482

April 23, 1987

Mr. Basil G. Constantelos, Director
Waste Management Division
USEPA - Region V
230 South Dearborn Street
Chicago, Illinois 60604

RECEIVED
APR 23 1987

U.S. EPA REGION V
SOLID WASTE DIVISION
APR 27 1987

Attention: 5HS-JCK-13

U.S. EPA, REGION V
WASTE MANAGEMENT DIVISION
OFFICE OF THE DIRECTOR

Dear Mr. Constantelos:

Reference: Loss of Interim Status
Closure Plan Request
OHD 017 497 587

This is in reply to your letter of April 9, 1987, addressed to the Alliance, Ohio, Works of American Steel Foundries, division of AMSTED Industries Incorporated. The letter was received April 20, 1987.

The Alliance Works originally submitted a Part A application for Interim Status as a hazardous waste facility in November, 1980. The application was withdrawn on June 25, 1982, when testing revealed that none of the waste streams as disposed are hazardous wastes as defined by applicable RCRA regulations. The withdrawal of such application was acknowledged by an April 19, 1983, letter from the U.S. EPA - Region V. Copies of both letters are enclosed.

Accordingly, the ASF Alliance Works, OHD 981 090 418 and its associated landfill in Sebring Township, OHD 017 497 587, are not RCRA Part A permit applicants and are not in violation of any applicable RCRA interim status regulations, including those applicable to groundwater monitoring, financial assurance or closure plans.

Mr. Basil G. Constantelos, Director
April 23, 1987
Page 2

Please address any further questions in this matter to the undersigned.

Sincerely,



Edward J. Brosius
Senior Attorney

EJB:am

cc: Ohio EPA
C. A. Ruud
C. R. Dixon
G. K. Barnes

June 25, 1982

RCRA Activities
U. S. EPA - Region V
P. O. Box 3587A
Chicago, Illinois 60690-3587

RE: American Steel Foundries
1001 East Broadway
Alliance, Ohio 44601
OHDO 17497587

Dear Sirs:

AMSTED Industries Incorporated hereby withdraws the Part A Hazardous Waste Permit Application for its American Steel Foundries facility in Alliance, Ohio. Further testing of the waste stream has shown that this facility has not and does not now treat, store or dispose of any hazardous waste as defined by the EPA.

It is desired to maintain the EPA ID number for this facility.

Very truly yours,


L. D. Davis
Vice President

ps

cc:


FPK

